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Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York

BY ECF

Re: United States v. Kenner & Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendants Tommy Constantine's ("Constantine") and Phil Kenner's ("Kenner") opposition to the government's Motion for Entry of an Order of Forfeiture is currently due on February 28, 2018. Constantine and Kenner are in the process of preparing their opposition papers. However, both defendants' attorneys did not conduct the extensive forfeiture hearing that was held by the Court. The government has accommodated by providing exhibits and information but the process of organizing the voluminous forfeiture materials and complex issues has been time consuming. For this reason, Constantine and Kenner respectfully request an extension of the due date of their forfeiture opposition to April 2, 2018. The government, by Assistant United States Attorney Diane Leonardo, consents to this application and respectfully requests to be permitted to file a Reply to the defendants' opposition on or before May 4, 2018.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Diane Leonardo (by ECF)
AUSA Madeline O'Connor (by ECF)
AUSA Saritha Komatireddy (by ECF)
AUSA Matthew Haggans (by ECF)